

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**RECEIVED**  
**MAY 04 2004**  
PUBLIC SERV. OF  
COMMISSION

IN THE MATTER OF:

BALLARD RURAL TELEPHONE  
COOPERATIVE CORPORATION, INC.

PSC CASE NO. 2004-00036

v.

JACKSON PURCHASE ENERGY CORPORATION

**JACKSON PURCHASE ENERGY CORPORATION'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**INTERROGATORIES**

1. How many utility poles are currently owned by Ballard?
2. How many utility poles did Ballard own in 1974, when the current joint use agreement with JPEC was signed?
3. Please explain any differences in the answers to questions 1 and 2. Specifically, if Ballard has decreased the number of poles it owns, what business decisions led to such a change?
4. What are the costs associated with maintaining these poles, i.e. maintenance, labor, replacement, etc.?
5. What other joint use agreements involving pole use is Ballard currently obligated under, if any?
6. If Ballard is contractually bound by other joint use agreements, what rates are being used under those agreements?
7. Have any of Ballard's other joint use agreements, if any exist, been filed with the PSC?
8. Does Ballard receive a tariffed rate for CATV access to its poles?
9. If so, what is the tariffed rate?

10. How much of an expense is avoided by Ballard, (in terms of maintenance, labor, replacement cost etc.) by using poles owned by JPEC.
11. Has Ballard properly followed the procedures for the designation of a JPEC pole as a joint use pole under the 1954 joint use agreement and its successors?

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce all joint use agreements involving utility poles, where Ballard is a party.
2. Produce all financial statements from 2001 through the present.
3. Produce all board minutes of meetings where Ballard's contractual relationship with JPEC was discussed in 2002 through the present.
4. Produce all board minutes of meetings where any change in Ballard's policies for construction or maintenance of utility poles was discussed.

Respectfully submitted,

DENTON & KEULER  
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By Walter R. Luttrull, III  
Walter R. Luttrull, III

ATTORNEYS FOR JACKSON PURCHASE ENERGY  
CORPORATION

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by mailing via U.S. Mail to:

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**AND** via facsimile transmission to:  
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True and correct copies of the  
foregoing have been mailed to:

ANITA MITCHELL ESQ  
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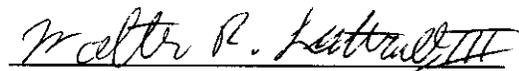
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on this 30th day of April, 2004.



Walter R. Luttrull, III

CC: Kelly Nuckols @ Jackson Purchase Energy Corporation